

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KRAFT FOODS GLOBAL, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 11-cv-8808
)	
v.)	Hon. Steven C. Seeger
)	
UNITED EGG PRODUCERS, INC., <i>et al.</i> ,)	
)	
Defendants.)	
)	


RULINGS ON DEPOSITION DESIGNATIONS – CURTIS AMUNDSON

April 3, 2014 Deposition

Testimony	Objections	Rulings
72:25-73:12, 74:4-11	402/403: lengthy comparison of FMI's support for guidelines other than those governing egg-laying hens is not relevant and is overly prejudicial. The jury has heard and seen that Kraft was concerned about animals including but not limited to hens. But to learn of FMI's position on the legitimacy or validity of trade association guidelines for the welfare of animals not implicated by this litigation invites the jury to improperly infer that—because industry-wide guidelines are commonplace and often supported by FMI—they also are likely to be legitimate. This objection includes both Exhibit 16 and the related testimony at 72:25-73:12, 74:4-11.	Sustained.
Ex. 16 (Def. Tr. Ex. 82)		

74:4-11 (completeness)	Plaintiffs object to 74:11 on 402/403 grounds. Witness refers to AMI guidelines--American Meat Institute, not implicated in this case—as being a "nice program."	Sustained.
Ex. 18 (Def. Tr. Ex. 102)	402/403: Testimony and Exhibit 18 are exclusively about dairy farming.	Sustained. The document seems insufficiently tied to eggs and to hen welfare to have any probative value.
77:5-6, 77 :12-16, 77:24-78:2, 78:17- 79:2, 79:17-18, 80:3-1, 81:13-82:16		
95:22-95:25, 96:1- 97:10	602	Overruled.

Date: November 3, 2023



Steven C. Seeger
United States District Judge